FILED Clerk District Court

APR 2 4 2005

For The Northern Mariana Islands (Deputy Clerk)

Robert D. Bradshaw PO Box 473 1530 W. Trout Creek Road Calder, Idaho 83808 Phone 208-245-1691

Plaintiff, Pro Se

## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN MARIANA ISLANDS

ROBERT D. BRADSHAW	) Civil Action No. 05-0027
Plaintiff	
v.	
COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS (hereafter referred to as the CNMI); et. al.	) MOTION TO CLERK OF COURT ) TO ENTER A DEFAULT ) JUDGMENT AGAINST ) DEFENDANT ANDREW ) CLAYTON
Defendants	)

TO THE CLERK OF THE US DISTRICT COURT FOR THE NORTHERN MARIANA ISLANDS

- 1. Comes plaintiff ROBERT D. BRADSHAW In Civil Case 05-0027 to petition the court to enter a default judgment against Defendant ANDREW CLAYTON for the amount as claimed in the complaint, as amended, plus costs because defendant CLAYTON has failed to appear and to respond to the summons served on him.
- 2. The rules of the court are plain and unambiguous regarding service and the duty of those served to respond to a summons. Defendant CLAYTON is a lawyer and should understand this matter.

- 3. On the CLAYTON complaint, as amended, and summons, default commenced on Apr 20, 2006 when Defendant CLAYTON failed to appear and answer the summons served on him.
- 4. Actual damages claimed are \$8,000.00 (including costs from 96-1320 and 05-0084); punitive, exemplary, compensatory, special, general and other damages are \$418,000.00; and costs for 05-0027 are \$12,898.00--all of which total to \$438,898.00.
- 5. As this case involves a failure to appear with a sum which can be calculated as certain, as defined in rule 55 of the Foderal Rules of Civil Process, request that the Clerk of the US District Court for the Northern Mariana Islands enter a default judgment against Defendant ANDREW CLAYTON.

Robert D. Bradshaw, Plaintiff, Pro Se

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## CERTIFICATE OF SERVICE

m. day of \_ I HEREBY CERTIFY that on the served a true copy of the foregoing document by US Mail Postage Paid to each of the following:

Jay H. Sorensen, c/o Shanghai, PO Box 9022, Warren, MI 48090-9022 Kristin St Poter, Asst Attorney General, Caller Box 10007, Capitol Hill, Saipan, MP 96950

Patrick Civille, Civille & Tang, PLLC, PMB 86, PO Box 10003, Salpan, MP 96950